
Exhibit 6

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

AHARON MILLER, et al.,

Plaintiffs,

-against-

ARAB BANK, PLC,

Defendant.

Case No. 18-cv-2192 (BMC)(PK)

NATHAN PAM, et al.,

Plaintiffs,

-against-

ARAB BANK, PLC,

Defendant.

Case No. 18-cv-4670 (BMC)(PK)

**DEFENDANT ARAB BANK, PLC'S RESPONSES AND OBJECTIONS TO
PLAINTIFFS' FIRST REQUEST FOR THE PRODUCTION OF DOCUMENTS**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, Defendant Arab Bank, plc ("Arab Bank"), by its undersigned counsel, hereby responds and objects to Plaintiffs' First Request for the Production of Documents dated July 22, 2019 (the "Requests") as follows:

OBJECTIONS APPLICABLE TO MOST REQUESTS¹

1. Arab Bank objects to the Requests to the extent that they seek the production of documents that do not specifically relate to the allegations in the "Complaints" (as defined in the Requests). The Requests seek documents related to bank accounts and transactions for 281 individuals and entities, only 42 of which are mentioned in the Complaints. Of those 42 individuals and entities, only 4 are alleged to have committed, planned, or authorized any of the 14 attacks that Plaintiffs claim caused their alleged injuries (the "Incidents"). Thus Arab Bank objects to

¹ Because these objections apply to multiple Requests, for the sake of brevity, they are stated in full only at the outset; as applicable, they are also referenced in the responses to each separate Request.

these Requests on the grounds that they are overly broad, outside the scope of the Complaints' allegations against Arab Bank, unduly burdensome, disproportionate to the needs of the case,² and request the production of documents that are not relevant to the claims or defenses of any party.

2. Arab Bank objects to these Requests to the extent they seek disclosure of documents that are subject to bank confidentiality laws of the countries in which Arab Bank operates. The Requests seek the production of documents located outside of the United States regarding financial services rendered outside of the United States, particularly in Jordan, Lebanon, and the Palestinian Territories. As Arab Bank noted in its Answers, Arab Bank is constrained from responding to such requests by the bank confidentiality laws of those jurisdictions. (*See Miller v. Arab Bank, PLC*, 18-cv-2192 (BMC)(PK) (Dkt. 39 at 1-2); *Pam v. Arab Bank, PLC*, 18-cv-4670 (BMC)(PK) (Dkt. 32 at 1-2; Dkt. 33 at 1-2)). Violating those laws would expose Arab Bank to criminal sanctions and fines and would undermine the legally protected privacy rights of foreign persons who are not parties to these actions.³ As Plaintiffs and the Court are aware, Arab Bank cannot produce banking records without the account holders' permission or regulatory approval. The Requests call for banking records for hundreds of accounts, most of which are for people or entities with no connection to the Incidents. It will be difficult, if not impossible, for Arab Bank to obtain customer consent or regulatory approval for all of the records Plaintiffs have requested. Arab Bank

² Throughout these Responses, an objection that a Request is "disproportionate" means that it is disproportionate to the needs of the cases based on the factors set forth in Rule 26(b)(1) of the Federal Rules of Civil Procedure.

³ *See* Br. for the United States as Amicus Curiae, *Arab Bank, PLC v. Linde, et al.*, No. 12-1485, 2014 WL 2191224, at *16-17 (S. Ct. May 23, 2014) (noting that "criminal statutes governing bank secrecy in a number of foreign jurisdictions prohibit disclosing the [foreign financial information] sought by" plaintiffs and further noting that these statutes "reflect legitimate sovereign interests in protecting foreign citizens' privacy and confidence in the nations' financial institutions").

respectfully objects on the grounds that these Requests are impermissibly broad, unduly burdensome, and disproportionate to the needs of the case. Fed. R. Civ. P. 26(b)(1).

To make this process more practicable, Arab Bank suggests that Plaintiffs make a good faith effort to narrow these Requests to be proportional to the allegations in these cases. Attempting to request foreign regulators to waive bank confidentiality laws for the accounts of hundreds of customers who are not identified in the Complaints—and thus have no connection to the Incidents—severely jeopardizes the success of any waiver request. Once the Court rules on the appropriate scope of the Requests, Arab Bank is prepared to work with Plaintiffs and the Court to pursue all lawful means to obtain relevant banking records that are proportional to these cases, including seeking customer consent and regulatory approval. Arab Bank also will work with Plaintiffs’ counsel and the Court to prepare appropriate Letters Rogatory under the Hague Convention and similar laws to obtain foreign court approval for the production of relevant and proportional banking records. Arab Bank previously produced in *Linde v. Arab Bank, PLC*, No. 04-cv-02799 (E.D.N.Y.) (the “*Linde* case”) foreign bank account records after affirmatively obtaining the consent of the Saudi Committee in Support of the Palestinian People (the “Saudi Committee”) and the Lebanese Special Investigation Commission (the “LSIC”). As detailed below, Arab Bank is producing certain of those documents in these cases.

3. Arab Bank objects to the Requests to the extent they seek the production of documents or information protected by privileges, including but not limited to the attorney-client privilege, the attorney work product doctrine, and any other legally recognized obligation and/or rule. Arab Bank hereby claims such privileges and objects to the production of any documents subject thereto. Arab Bank will produce an appropriate privilege log that complies with E.D.N.Y.-S.D.N.Y. Local Civil Rule 26.2.

4. Arab Bank objects to the definition of “Arab Bank” to the extent it goes beyond the named Defendant, Arab Bank, plc.

5. Arab Bank objects to the characterization of certain individuals and entities, including the vagueness of the terms used to describe them, referred to in the Requests as HAMAS “Suicide Bombers,” “Martyrs,” terrorists, leaders, operatives, agents, zakat committees, Islamic societies, social institutions, and/or fundraising organizations.

RESPONSES AND OBJECTIONS TO SPECIFIC DOCUMENT REQUESTS⁴

The following Responses and Objections to specific Requests are made in addition to and without waiving the foregoing Objections Applicable to Most Requests (the “Initial Objections”), which are expressly incorporated into the responses and objections set forth below.

REQUEST NO 1:

All Documents concerning the account of senior HAMAS leader Osama Hamdan at the Al-Mazra’a branch in Beirut, Lebanon, Account # 3-810-622473-0330, that was used by HAMAS to solicit contributions on its website www.palestine-info.com, including all communications concerning the decision to return the balance in the account to Osama Hamdan.

RESPONSE TO REQUEST NO 1:

Arab Bank objects to Request No. 1 on the grounds that it seeks information that is overly broad, not relevant, and disproportionate to the claims and defenses in these cases because there are no specific allegations that Osama Hamdan committed, planned, or authorized any of the Incidents. *See* Initial Objections, No. 1. Subject to and without waiving the foregoing, Arab Bank

⁴ In responding to these Requests, Arab Bank is producing documents by identifying Bates numbers of documents previously produced in the *Linde* case (hereinafter referred to as “*Linde* Bates Nos.”) with the understanding that the parties will: (1) adhere to the prior confidentiality designations for those documents under the meanings set forth in the *Linde* Protective Order (*see* Dkt. 85); and (2) otherwise maintain documents pursuant to the terms set forth in the Protective Orders entered by this Court in *Pam* (*see* Dkt. 43) and *Miller* (*see* Dkt. 50). To the extent that this is contradictory to the Instructions for these Requests, including Instruction Nos. 3, 5, 7, 8, and 13, Arab Bank objects to those instructions as overly burdensome.

is producing the *Linde* Bates Nos. set forth in Exhibit 1, and Arab Bank will continue to conduct a reasonable search for, and produce on a rolling basis, non-privileged documents responsive to this Request.

REQUEST NO 2:

All Documents concerning accounts maintained at Arab Bank by the following HAMAS leaders, operatives and agents:

- a. Ahmed Yassin a/k/a Ahmad Yasine (*see, e.g.,* ABPLC211999);
- b. Halima Yassin (Ahmed Yassin's wife) (*see, e.g.,* ABPLC212107);
- c. Khalil Hasan Yassin (Ahmed Yassin's nephew) (*see, e.g.,* ABPLC212064);
- d. Abd al-Hakim Ali al-Mana'ameh (Ahmed Yassin's bodyguard) (*see, e.g.,* ABPLC212158);
- e. Osama Hamdan (all Documents not encompassed by Request No. 1 above);
- f. Ismail Abd Al Salam Haniyeh a/k/a Ismail Haniya (*see, e.g.,* ABPLC195876);
- g. Ismail Abu Shanab (*see, e.g.,* ABPLC212138);
- h. Salah Shehadeh (*see, e.g.,* ABPLC212108);
- i. Layla Khamis Yusuf Safira (Salah Shehadeh's wife) (*see, e.g.,* ABPLC021783);
- j. Abbas al-Sayed (*see, e.g.,* ABPLC211884);
- k. Huda Ahmad Darwazah (Salah al-Din Darwazah's wife) (*see, e.g.,* ABPLC212104);
- l. Muhammad Shama (*see, e.g.,* ABPLC211951);
- m. Ghazi Hamed (*see, e.g.,* ABPLC211868);
- n. Jamal Salim (*see, e.g.,* ABPLC211808);
- o. Muna Mansur, the wife of HAMAS leader Jamal Mansur (*see, e.g.,* ABPLC211930);
- p. Riyadh Husain Abdallah Abu Zaid (*see, e.g.,* ABPLC211928);
- q. Mahdi Shaker al-Hanbali (*see, e.g.,* ABPLC211856);
- r. Baha al-Din al-Madhun (*see, e.g.,* ABPLC212009);
- s. Abd al-Khaleq al-Natsheh (*see, e.g.,* ABPLC195871);
- t. Khaled Muhammad Amin al-Haj (*see, e.g.,* ABPLC212037);
- u. Nada Jamal al-Jayousi (*see, e.g.,* ABPLC212055);
- v. Asma' Muhammad Suliman Saba'ana, wife of Jamal Abd al-Salam Abu al-Hija (*see, e.g.,* ABPLC010758);
- w. Lateefah Naji Othman Chawa (*see, e.g.,* ABPLC212188);
- x. Khaled Ghazi Daud al-Masri (*see, e.g.,* ABPLC211949);
- y. Abd al-Salam Ismail Haniyeh (*see, e.g.,* ABPLC211961);
- z. Khaled Ibrahim Al Abd Al Quqa (*see, e.g.,* ABPLC212014);
- aa. Khalil Mohamad Amin El Haj (*see, e.g.,* ABPLC212061);
- bb. Mohamed Redwan Ibrahim Yasine (*see, e.g.,* ABPLC212006); and

cc. Rabah Hayel Takroui (*see, e.g.*, ABPLC211970).

RESPONSE TO REQUEST NO 2:

Arab Bank objects to Request No. 2 on the grounds that it seeks information that is overly broad, not relevant, and disproportionate to the claims and defenses in these cases. In particular, of the 29 alleged HAMAS operatives for whom Plaintiffs are requesting information, only 15 are referenced in the Complaints and none are alleged to have committed, planned, or authorized any of the Incidents. *See* Initial Objections, No. 1. Arab Bank further objects to Request No. 2 to the extent it seeks production of banking records located in foreign jurisdictions that are subject to bank confidentiality laws prohibiting banks from disclosing such records under threat of civil and criminal penalties absent customer consent or regulatory approval. *See* Initial Objections, No. 2. Subject to and without waiving the foregoing, Arab Bank is producing the *Linde* Bates Nos. set forth in Exhibit 1, which relate to individuals who are identified in the Complaints. Arab Bank will continue to conduct a reasonable search for, and produce on a rolling basis, non-privileged documents responsive to this Request that relate to individuals identified in the Complaints.

REQUEST NO 3:

All Documents concerning accounts at Arab Bank or funds transfers by Arab Bank concerning the following HAMAS leaders and operatives:

- a. Ayman Anwar Ahmad Arafat (*see, e.g.*, ABPLC212149);
- b. Mohamad Saleh Taha (*see, e.g.*, ABPLC212099);
- c. Omar Ali Abd al-Al (*see, e.g.*, ABPLC211926);
- d. Sabah Saeed Hasan Dar Khalil (*see, e.g.*, ABPLC211913);
- e. Sayed Abu Msameh (*see, e.g.*, ABPLC211983);
- f. Omar Saleh Muhammad Faiq Sharif;
- g. Firas Fawzi Salim Faydi;
- h. Khaled Dib Hasan Abu Hamd;
- i. Muhammad Hasan Arman;
- j. Walid Abd al-Aziz Anjas;
- k. Wa'el Mahmud 'Muhammad Ali' Qasem;
- l. Ala al-Din Mahmud Muhammad Abasi;
- m. Wisam Sa'id Musa Abasi;
- n. Muhammad Ishaq Awda;

- o. Jamal al-Tawil;
- p. Ibrahim Jamil Mar'i Hamed;
- q. Abdalla Ghaleb Abdalla Barghuthi;
- r. Farid Salah Na'im Atrash;
- s. Ayad Yusuf Abu Hilal;
- t. Aziz Yusuf Ins Abu Hilal;
- u. Abd el-Mu'ati Shabana;
- v. Muhammad Fathi Farhat a/k/a Mohammed Farhath;
- w. Abd Allah Qawasmeh;
- x. Izz al-Din Khader Shams al-Din Misk;
- y. Ahmad Othman Muhammad Badr;
- z. Sayid Isa Jabar Siam;
- aa. Bilal Sub Laban; and
- bb. Amar Nasser al-Din.

RESPONSE TO REQUEST NO 3:

Arab Bank objects to Request No. 3 on the grounds that it seeks information that is overly broad, not relevant, and disproportionate to the claims and defenses in these cases. In particular, of the 28 alleged HAMAS leaders and operatives for whom Plaintiffs are requesting information, only 5 are referenced in the Complaints and only 4 are alleged to have committed, planned, or authorized any of the Incidents. *See* Initial Objections, No. 1. Arab Bank further objects to Request No. 3 on the grounds that it is vague, ambiguous, unduly burdensome, and/or seeks information outside of Arab Bank's knowledge because it calls for all documents relating to: (1) Arab Bank accounts "concerning" the listed individuals without identifying the persons who allegedly opened or maintained the accounts; and (2) "funds transfers by Arab Bank concerning" the listed individuals without identifying who initiated and/or received the funds transfers. Arab Bank further objects to Request No. 3 to the extent it seeks production of banking records located in foreign jurisdictions that are subject to bank confidentiality laws prohibiting banks from disclosing such records under threat of civil and criminal penalties absent customer consent or regulatory approval. *See* Initial Objections, No. 2. Subject to and without waiving the foregoing, Arab Bank will conduct a reasonable search for, and produce on a rolling basis, non-privileged

documents responsive to this Request that relate to accounts opened or maintained at Arab Bank, or funds transfers initiated and/or received, by individuals identified in the Complaints.

REQUEST NO 4:

All Documents concerning accounts maintained at Arab Bank by or for the following HAMAS zakat committees, Islamic societies and social institutions or transfers involving those committees, societies and institutions:

- a. *Al-Mujama Al-Islami* – Gaza (the Islamic Center – Gaza) (*see, e.g.,* ABPLC212510);
- b. *Al-Jam'iya Al-Islamiya* – Gaza (the Islamic Society – Gaza) (*see, e.g.,* ABPLC212752);
- c. *Al-Salah Islamic Society*– Gaza (*Jam'iyat al-Salah al-Islamiya* – Gaza) (*see, e.g.,* ABPLC212336);
- d. *Islamic Charitable Society* – Hebron (*Al-Jam'iya al-Khiriya al-Islamiya al-Khalil*) (*see, e.g.,* ABPLC212755);
- e. Jenin Zakat Committee (*Lajnat al-Zakah Jenin*) (*see, e.g.,* ABPLC211751);
- f. Nablus Zakat Committee (*Lajnat al-Zakah Nablus*) (*see, e.g.,* ABPLC211766);
- g. *Al-Tadamun Charitable Society* – Nablus (*Jam'iyat Al-Tadamun al-Khiriya al-Islamiya Nablus*) (*see, e.g.,* ABPLC212662);
- h. Tulkarem Zakat Committee (*Lajnat al-Zakah Tulkarem*) (*see, e.g.,* ABPLC212314);
- i. Ramallah – al-Bireh Zakat Committee (*Lajnat al-Zakah Ramallah wal-Bireh*) (*see, e.g.,* ABPLC212303);
- j. Al-Islah Charitable Society – Ramallah & Al-Bireh (*Jam'iyat al-Islah al-Khiriya al-Ajthamiya Ramallah wal-Bireh*) (*see, e.g.,* ABPLC212301);
- k. *Al Nur Prisoner Society* - Gaza, a/k/a the Charity Society for Caring for the Prisoners and the Martyrs' Families (*Jam'iyat Al-Nur al-Khairiya L-Ri'ayat al-Asra Wa-Usar al-Shuhada*) (*see, e.g.,* ABPLC212928); and
- l. Al-Huda Women Society (*Jam'iyat al-Huda al-Nisa'iya*).

RESPONSE TO REQUEST NO 4:

Arab Bank objects to Request No. 4 on the grounds that it seeks information that is overly broad, not relevant, and disproportionate to the claims and defenses in these cases. In particular, of the 12 organizations for which Plaintiffs are requesting information, none are alleged to have committed, planned, or authorized any of the Incidents. *See* Initial Objections, No. 1. Arab Bank further objects to Request No. 4 on the grounds that it is vague, ambiguous, unduly burdensome,

and/or seeks information outside of Arab Bank's knowledge because it calls for all documents concerning: (1) "accounts maintained at Arab Bank by or for" the listed organizations without identifying the persons who allegedly opened or maintained the accounts; and (2) "transfers involving" the listed organizations without identifying the individuals who initiated and/or received the transfers. Arab Bank further objects to Request No. 4 to the extent it seeks production of banking records located in foreign jurisdictions that are subject to bank confidentiality laws prohibiting banks from disclosing such records under threat of civil and criminal penalties absent customer consent or regulatory approval. *See* Initial Objections, No. 2. Subject to and without waiving the foregoing, Arab Bank is producing the *Linde* Bates Nos. set forth in Exhibit 1, which relate to organizations that are identified in the Complaints. Arab Bank will continue to conduct a reasonable search for, and produce on a rolling basis, non-privileged documents responsive to this Request that relate to accounts opened or maintained at Arab Bank, or transfers initiated and/or received, by organizations identified in the Complaints.

REQUEST NO 5:

All Documents concerning accounts maintained at Arab Bank by or transfers involving the following HAMAS fundraising organizations designated as SDGTs:

- a. Union of Good a/k/a I'tilaf al-Khayr, including but not limited to Arab Bank account #002850/811/9 at the Beirut, Lebanon branch;
- b. Holy Land Foundation for Relief and Development;
- c. Interpal a/k/a Palestine Relief and Development Fund;
- d. CBSP a/k/a Comité de Bienfaisance et de Secours Aux Palestiniens;
- e. Al Aqsa Foundation; and
- f. Welfare Association for Palestinian and Lebanese Families a/k/a Waqifiya Ri'aya al-Usra al-Filistinya wa al-Lubnanya.

RESPONSE TO REQUEST NO 5:

Arab Bank objects to Request No. 5 on the grounds that it seeks information that is overly broad, not relevant, and disproportionate to the claims and defenses in these cases. In particular, of the 6 organizations for which Plaintiffs are requesting information, none are alleged to have

committed, planned, or authorized any of the Incidents. *See* Initial Objections, No. 1. Arab Bank also objects to Request No. 5 on the grounds that it is vague, ambiguous, unduly burdensome, and/or seeks information outside of Arab Bank’s knowledge because it calls for all documents concerning “transfers involving” the listed organizations without identifying the individuals who initiated and/or received the transfers. Arab Bank further objects to Request No. 5 to the extent it seeks production of banking records located in foreign jurisdictions that are subject to bank confidentiality laws prohibiting banks from disclosing such records under threat of civil and criminal penalties absent customer consent or regulatory approval. *See* Initial Objections, No. 2. Subject to and without waiving the foregoing, Arab Bank is producing the *Linde* Bates Nos. set forth in Exhibit 1, which relate to organizations that are identified in the Complaints. Arab Bank will continue to conduct a reasonable search for, and produce on a rolling basis, non-privileged documents responsive to this Request that relate to accounts opened or maintained at Arab Bank, or transfers initiated and/or received, by organizations identified in the Complaints.

REQUEST NO 6:

All Documents concerning transactions processed by Arab Bank for or on behalf of the Saudi Committee for the benefit of the families of the following HAMAS Suicide Bombers,⁵ including, but not limited to, transaction records, account statements, account opening documentation, communications concerning the transactions and/or recipients, receipts issued by Arab Bank to account holders and/or payees, and death certificates, photographic identification and/or certificates of martyrdom for the individuals that qualified the account holder or payee to receive payment:

1. Fatima ‘Ali Hasan Halabiya (*see, e.g.,* ABPLC026358, ABPLC030875);
2. Atallah Yusuf ‘Abd Al-Jabbar ‘Amer (*see, e.g.,* ABPLC023947);
3. Shuhayl Ahmad Isma’il el-Masri (*see, e.g.,* ABPLC024025);
4. Muhammad Sa’id Ahmad Abu Safi (*see, e.g.,* ABPLC018097);
5. Mahmud Iyada Adi Salah Al-Din (*see, e.g.,* ABPLC026374);
6. Nabil Ibrahim Saleh Dar Jabar (*see, e.g.,* ABPLC026286);
7. Arafat Muhammad Suliman Ashur (*see, e.g.,* ABPLC021770);

⁵ The Request refers to each of the listed individuals as alleged “HAMAS Suicide Bombers,” and Arab Bank is responding to the Request as written.

8. Bashir Khalil Ibrahim al-Ma'sawabi (*see, e.g.*, ABPLC021732);
9. Talal Mustafa Ibrahim Abu Kweik (*see, e.g.*, ABPLC021661);
10. Muhi al-Din Kamel Saleh Habeisheh (*see, e.g.*, ABPLC030707);
11. Nuha Muhammad Taysir Mustafa al-Nadher (*see, e.g.*, ABPLC021746);
12. Hasan Hussein Hassan Hutari (*see, e.g.*, ABPLC023935);
13. Yusuf Muhammad Yusuf Hamad (*see, e.g.*, ABPLC030821);
14. Nifin Yusuf Muhammad al-Ajrami (*see, e.g.*, ABPLC026223);
15. Yusri Muhammad al-Tawil (*see, e.g.*, ABPLC020316);
16. Family of the martyr Muhammad Abd Rabo Imad (*see, e.g.*, ABPLC030783);
17. Ibrahim Mahmud Abd al-Salam Ashur (*see, e.g.*, ABPLC026234);
18. Muhammad Abd Rabo Ibrahim Fayad (*see, e.g.*, ABPLC030578);
19. Muhammad Subhi Mahmud Ahmad Sayid (*see, e.g.*, ABPLC030655);
20. Kamel Sa'id Abdalla Zbeidi (*see, e.g.*, ABPLC023867);
21. Umar Hamdan Ahmad Alayan (*see, e.g.*, ABPLC024010);
22. Hasan Muhammad Hasan Abu Nasr (*see, e.g.*, ABPLC021735);
23. Yaser 'Arafat Khalil Ansiwi (*see, e.g.*, ABPLC010760); and
24. Zuhira Ahmad Faleh Abu Hijla (*see, e.g.*, ABPLC023921).

RESPONSE TO REQUEST NO 6:

Arab Bank objects to Request No. 6 on the grounds that it seeks information that is overly broad, not relevant, and disproportionate to the claims and defenses in these cases. In particular, of the 24 alleged "HAMAS Suicide Bombers" for whom Plaintiffs are requesting information, none are referenced in the Complaints, much less alleged to have committed, planned, or authorized any of the Incidents. *See* Initial Objections, No. 1. Additionally, the Request calls for all banking records for the intended beneficiaries of these transactions, but the Complaints do not allege such records are related to any of the Incidents. Arab Bank further objects to Request No. 6 to the extent it seeks production of banking records located in foreign jurisdictions that are subject to bank confidentiality laws prohibiting banks from disclosing such records under threat of civil and criminal penalties absent customer consent or regulatory approval. *See* Initial Objections, No. 2. Subject to and without waiving the foregoing, Arab Bank is producing the *Linde* Bates Nos. set forth in Exhibit 1, which include approximately 180,000 documents and

represent all of the Saudi Committee documents that Arab Bank has in its possession and produced in *Linde* after affirmatively obtaining the Saudi Committee's consent.

REQUEST NO 7:

All Documents concerning transactions processed by Arab Bank for or on behalf of the Saudi Committee for the benefit of families of the following HAMAS "Martyrs," including, but not limited to, transaction records, account statements, account opening documentation, communications concerning the transactions and/or recipients, receipts issued by Arab Bank to account holders and/or payees, and death certificates, photographic identification and/or certificates of martyrdom for the individuals that qualified the account holder or payee to receive payment:

1. Muna Salim Saleh Mansur (*see, e.g., ABPLC023919*);
2. Shafiq 'Ali Suliman Abu Al-Rus (*see, e.g., ABPLC030780*);
3. Muhammad Abdallah Salem Halas (*see, e.g., ABPLC026216*);
4. Muhammad abd al-Hadi Aqal (*see, e.g., ABPLC026421*);
5. Fawzi Mahmud Ahmad Abd al-Ghani (*see, e.g., ABPLC026290*);
6. Rabi' Muhammad Saleh al-Batash (*see, e.g., ABPLC026220*);
7. Ilfat Jaber Saleh al-Razayna and Dib al-Razayna (*see, e.g., ABPLC028692*);
8. Mustafa Fuad Khalil al-Dahshan (*see, e.g., ABPLC026241*);
9. Hamdi Ahmad al-Masri and Rasmiya Hasan al-Masri (*see, e.g., ABPLC028678*);
10. Nizar Abd al-Qader Riyan (*see, e.g., ABPLC030565*);
11. Ahmad Salem Muhammad Halas (*see, e.g., ABPLC030602*);
12. Fayez Mustafa Muhammad Shehada (*see, e.g., ABPLC030614*);
13. Abd al-Ghani Muhammad Jud'an Abu Jamus (*see, e.g., ABPLC026255*);
14. Atiwi Hamdan Salem Abu Rizq (*see, e.g., ABPLC026237*);
15. Family of the martyr Yaser Husni Al-Masdar (*see, e.g., ABPLC030627*);
16. Rasmiya Ismail Ibrahim Asida (*see, e.g., ABPLC026372*);
17. Naser 'Abd Al-Salam Ahmad Gazal (*see, e.g., ABPLC030773*);
18. Razan Husni Hilmi Halawa (*see, e.g., ABPLC026275*);
19. Lina Hafez Muhammad Sawaliha (*see, e.g., ABPLC030714*);
20. Wafaa' Ibrahim Jaber al-Ghul (*see, e.g., ABPLC026403*);
21. Faten Hasan Abd al-Qader Taqi (*see, e.g., ABPLC030713*);
22. Lafi Yusuf Hamed al-Akhras and Khatam (*see, e.g., ABPLC026179*);
23. Ali Abd al-Qader Qassem Atiq (*see, e.g., ABPLC030794*);
24. Tahrir Atalla Shaker Marshud (*see, e.g., ABPLC030649*);
25. Ayman Yusuf Abd al-Rahman Abd al-Wahab (*see, e.g., ABPLC030566*);
26. Fawziya Ali Mustafa Abu Hijla (*see, e.g., ABPLC026330*);
27. Abd al-Rahim Abd al-Razaq Tubasi (*see, e.g., ABPLC030643*);
28. Taysir Husein Ahmad Fayed (*see, e.g., ABPLC030941*);
29. Mahmud Yusuf Abu al-Hija (*see, e.g., ABPLC030940*);
30. Inam Hilala Abd al-Rahim Aysha (*see, e.g., ABPLC026334*);
31. Salim Helmi Salim 'Abd Al-Haq (*see, e.g., ABPLC023973*);

32. Latifa Ahmad Muhammad Subh (*see, e.g.*, ABPLC023879);
33. Awatif Suliman Hasan Abu Bakra (*see, e.g.*, ABPLC018098);
34. Hasan Khader Mustafa Maluh (*see, e.g.*, ABPLC030719);
35. Nimer ‘Abd Husein Mufaraja (*see, e.g.*, ABPLC030729);
36. Jamal Ali Suliman Naijem (*see, e.g.*, ABPLC030671);
37. Family of the Martyr Ibrahim Abd al-Karim Bani Awda (*see, e.g.*, ABPLC011605);
38. Ali Yusuf Fayed (*see, e.g.*, ABPLC026266);
39. Mahmud Khadr Muhammad (*see, e.g.*, ABPLC030860);
40. Muhammad Ahmad Hasan Abu Hanud (*see, e.g.*, ABPLC026390);
41. Ali Muhammad Ahmad Hilwa (*see, e.g.*, ABPLC030932);
42. Hadil Khalil Ismail Hashayka (*see, e.g.*, ABPLC026336);
43. Mansur Hasan Al-Hadiri (*see, e.g.*, ABPLC026377);
44. Hussein Salem Amtir abu Dib (*see, e.g.*, ABPLC026189);
45. Muhammad Saleh Musa Kamil (*see, e.g.*, ABPLC030690);
46. Fawzi Salim Nayef Shabir and his son Zaher (*see, e.g.*, ABPLC026418);
47. Mahmud Mas’ud Muhammad Abu Al-Sebah (*see, e.g.*, ABPLC030761);
48. Rabah Darwish Husein Zaqut (*see, e.g.*, ABPLC023891);
49. Sabah Abd al-Karim Yusuf al-Shalabi (*see, e.g.*, ABPLC030922);
50. Amal Abd al-Karim Khalil Bishawi (*see, e.g.*, ABPLC023951);
51. Taysir Husein Ahmad Fayed (*see, e.g.*, ABPLC030941);
52. Nawal Muhammad Ahmad Musharaqa (*see, e.g.*, ABPLC030972);
53. Omar Salim Ahmad Hawashin (*see, e.g.*, ABPLC030919);
54. Jamal Sabri Abd al-Hamid Sweidan (*see, e.g.*, ABPLC021761);
55. Rajaa Mahmud Nimer Abu al-Hija (*see, e.g.*, ABPLC026319);
56. Isa Muhammad Mahmud Waishahi (*see, e.g.*, ABPLC030979);
57. Muhammad Said Hamed Sawafteh (*see, e.g.*, ABPLC030990);
58. Maysar Muhammad Hamed al-Surakji (*see, e.g.*, ABPLC030888); and
59. Muhammad Shehada Ibrahim Tafesh (*see, e.g.*, ABPLC021796).

RESPONSE TO REQUEST NO 7:

Arab Bank objects to Request No. 7 on the grounds that it seeks information that is overly broad, not relevant, and disproportionate to the claims and defenses in these cases. In particular, of the 59 alleged “HAMAS Martyrs” for whom Plaintiffs are seeking information, only 2 are referenced in the Complaints, and none are alleged to have committed, planned, or authorized any of the Incidents. *See* Initial Objections, No. 1. Additionally, the Request calls for all banking records for the intended beneficiaries of these transactions, but the Complaints do not allege such records are related to any of the Incidents. Arab Bank further objects to Request No. 7 to the extent it seeks production of banking records located in foreign jurisdictions that are subject to bank

confidentiality laws prohibiting banks from disclosing such records under threat of civil and criminal penalties absent customer consent or regulatory approval. *See* Initial Objections, No. 2. Subject to and without waiving the foregoing, Arab Bank is producing the *Linde* Bates Nos. set forth in Exhibit 1, which include approximately 180,000 documents and represent all of the Saudi Committee documents that Arab Bank has in its possession and produced in *Linde* after affirmatively obtaining the Saudi Committee's consent.

REQUEST NO 8:

All Documents concerning transactions processed by Arab Bank on behalf of the Saudi Committee for the benefit of the families of the following HAMAS terrorists who were incarcerated in Israeli prisons, including, but not limited to, transaction records, account statements, account opening documentation, communications concerning the transactions and/or recipients, receipts issued by Arab Bank to account holders and/or payees, and death certificates, photographic identification and/or proof of incarceration for the individuals that qualified the account holder or payee to receive payment:

1. Samir Subhi Salah al-Shawa (*see, e.g.*, ABPLC011365);
2. Amiya Ahmad Hafez al-Taher (*see, e.g.*, ABPLC012363);
3. Mina Salim Saleh Mansur (*see, e.g.*, ABPLC010764);
4. Ni'ama Nuhad Khalil Dukhan (*see, e.g.*, ABPLC11342);
5. Abd al-Fatah Hasan Dukhan (*see, e.g.*, ABPLC021731);
6. Suad Suliman Istiti (*see, e.g.*, ABPLC012447);
7. Saleh Abdallah al-Barghuthi (*see, e.g.*, ABPLC012366);
8. Maysar Muhammad Hamed al-Surakji (*see, e.g.*, ABPLC012415);
9. A'isha Masah Haniya (*see, e.g.*, ABPLC011398);
10. Muna Fuad Khaled Najib (*see, e.g.*, ABPLC010968);
11. Rim Ibrahim Hamdan Abu al-Al (*see, e.g.*, ABPLC011772);
12. Maryam Muhammad Yusuf Farhat (*see, e.g.*, ABPLC011170);
13. Hanaa' Khamis Shehada Silmi (*see, e.g.*, ABPLC011101);
14. Fadel Khaled Husein Abu Hin (*see, e.g.*, ABPLC011146);
15. Fahed Yusuf Abu Atiya (*see, e.g.*, ABPLC012494);
16. Ja'afar Sa'id Yusuf Zuyud (*see, e.g.*, ABPL012413);
17. Rida Abdalla Isma'il al-Sanwar (*see, e.g.*, ABPLC011177);
18. Ali Ahmad Ayub (*see, e.g.*, ABPLC012491);
19. Samah Abd al-Hadi Abu Shawqa (*see, e.g.*, ABPLC011771);
20. Isma'il 'Abd al-Rahman Ahmad al-Ghanimat (*see, e.g.*, ABPLC011468);
21. Sahr Muhammad 'Ashur (*see, e.g.*, ABPLC010730);
22. Fatima Ahmad Muhammad Hiles (*see, e.g.*, ABPLC011056);
23. Zaynab Sha'ban Ahmad Taha (*see, e.g.*, ABPLC010980);
24. Basel Muhammad Shafiq al-Qawasmeh (*see, e.g.*, ABPLC010743);
25. Muhammad Salim Said Abu Hasna (*see, e.g.*, ABPLC011384);

26. Kamel Ya'qub Ta el-Ja'bari (*see, e.g.,* ABPLC012711);
27. Aziz Yusuf Ans abu Hilal (*see, e.g.,* ABPLC011367);
28. Nizam Ahed Sa'id Asfur (*see, e.g.,* ABPLC011427);
29. Wafaa' Ibrahim al-Ghul (*see, e.g.,* ABPLC011812);
30. Subhiya Saber Hussein (Hasan) abu Khalifa (*see, e.g.,* ABPLC012187);
31. Hiyam Sa'id Khalil (*see, e.g.,* ABPLC010805);
32. Hanan Muhammad Saleh (*see, e.g.,* ABPLC011755);
33. Dalal Muhammad Isa el-Zaban (*see, e.g.,* ABPLC011220);
34. Laila Khalil Ali al-Halabi (*see, e.g.,* ABPLC011790);
35. Shams Ahmad Mahmud al-Baluji (*see, e.g.,* ABPLC011015);
36. Abir Fayiz Ali Ramana (*see, e.g.,* ABPLC011376);
37. Abd al-Rauf Muhammad al-Mabhuh (*see, e.g.,* ABPLC011401);
38. Khadija abd al-Qader Musleh Salame (*see, e.g.,* ABPLC011388);
39. Fatima Muhammad 'Abd al-Fatah Naqib (*see, e.g.,* ABPLC010871);
40. Halima Ahmad Abu Fara (*see, e.g.,* ABPLC010863);
41. Asma' Muhammad Suliman Saba'ana (*see, e.g.,* ABPLC010758);
42. Sinyura Sha'ban Ahmad Abdalla (*see, e.g.,* ABPLC010936);
43. Dalal Ali Hasan al-Baz (*see, e.g.,* ABPLC011065);
44. Wajiha 'Abd al-Halim Rafiq Samaru (*see, e.g.,* ABPLC010751);
45. Wajida Abd al-Rahman Hamad al-Sawiti (*see, e.g.,* ABPLC019089);
46. 'Abd al-Mu'iz Zain al-Din Saleh 'Omar (*see, e.g.,* ABPLC010892);
47. Randa Isma'il Ahmad Aqel (*see, e.g.,* ABPLC011081);
48. Ismail Abd al-Jalil Ismail Ramadan (*see, e.g.,* ABPLC010956);
49. Samiya Jamal Musleh;
50. Abd el-Qader Ibrahim Mahmud Hijaz (*see, e.g.,* ABPLC012685);
51. Muzahira Ahmad Farhan al-Sharbaty (*see, e.g.,* ABPLC012465);
52. Maryam Dawud Abdalla al-Ghanimat (*see, e.g.,* ABPLC010690);
53. Maisun Husein Abu Zaina (*see, e.g.,* ABPLC010681);
54. Fadel Murshid Hamdan Baker (*see, e.g.,* ABPLC012439);
55. Khulud Faisal 'Abd al-Rahman al-Shalabi (*see, e.g.,* ABPLC011499);
56. Afaf Muhammad Abu Armila (*see, e.g.,* ABPLC012411);
57. Rabi'a Fayeze Muhammad Sa'id (*see, e.g.,* ABPLC012367);
58. Firas Wa'el Taleb Abu Sharakh (*see, e.g.,* ABPLC012746);
59. Rabi'aa Fayiz Muhammad Sa'id (*see, e.g.,* ABPLC012367);
60. Suhair Ibrahim al-Barghuthi (*see, e.g.,* ABPLC012630);
61. Fatina Saleh Muhammad Sa'ada (*see, e.g.,* ABPLC011237);
62. Muhammad Taher Naser (*see, e.g.,* ABPLC011276);
63. Naima Ahmad Muhammad Zarab (*see, e.g.,* ABPLC011334);
64. Sara Mahmud abd al-Hadi Talahmeh (*see, e.g.,* ABPLC011299);
65. Musa'ed Saleh al-Arabid (*see, e.g.,* ABPLC011768);
66. Munzir Muhammad Taysir Husein Ramadan (*see, e.g.,* ABPLC012393);
67. Halima Abd al-Qader Yaqub al-Asta (*see, e.g.,* ABPLC011278);
68. Almatha Abd al-Hafit' Ibrahim Jamjum (*see, e.g.,* ABPLC011039);
69. Nazha Khalil Hasan Ziyada (*see, e.g.,* ABPLC011128);
70. Halima Hamuda Ayd Shabir (*see, e.g.,* ABPLC011866);
71. Wafaa Fawzi al-Abd Dawidar (*see, e.g.,* ABPLC011136);

72. Zahira Mustafa Ahmad Asida (*see, e.g.*, ABPLC012456);
73. Nidal Ahmad Mahmud Hutari (*see, e.g.*, ABPLC010959);
74. Fatima ‘Abd al-Halim ‘Abd al-Mu’ti Abu Hamdiya (*see, e.g.*, ABPLC010873);
75. Rasmiya Mahmud Abdalla Zaqut (*see, e.g.*, ABPLC011764);
76. Tahrir Shaaban Muhammad al-Sharif (*see, e.g.*, ABPLC011087);
77. Raeda Mustafa Hasan Mushtaha (*see, e.g.*, ABPLC010971);
78. Khalil Abd al-Haq Sayid Amira (*see, e.g.*, ABPLC011547);
79. Safiya Abd al-Qader Dudin (*see, e.g.*, ABPLC012445);
80. Ikram Abd Salame Harez (*see, e.g.*, ABPLC011204);
81. Abala Ibrahim Saleh Abu Shamala (*see, e.g.*, ABPLC011102);
82. Isma’il Ibrahim al-Dirawi (*see, e.g.*, ABPLC021747);
83. Rida Abdalla Isma’il al-Sinwar (*see, e.g.*, ABPLC011116);
84. Muna Salman Hussein Hassan;
85. Lina Tahsin Muhammad Hamed (*see, e.g.*, ABPLC011525); and
86. Abdalla Khalil Abdalla Abu al-Rab (*see, e.g.*, ABPLC012483).

RESPONSE TO REQUEST NO 8:

Arab Bank objects to Request No. 8 on the grounds that it seeks information that is overly broad, not relevant, and disproportionate to the claims and defenses in these cases. In particular, of the 86 alleged “HAMAS terrorists” for whom Plaintiffs are seeking information, only 2 are referenced in the Complaints and none are alleged to have committed, planned, or authorized any of the Incidents. *See* Initial Objections, No. 1. Additionally, the Request calls for all banking records for the intended beneficiaries of these transactions, but the Complaints do not allege such records are related to any of the Incidents. Arab Bank further objects to Request No. 8 to the extent it seeks production of banking records located in foreign jurisdictions that are subject to bank confidentiality laws prohibiting banks from disclosing such records under threat of civil and criminal penalties absent customer consent or regulatory approval. *See* Initial Objections, No. 2. Subject to and without waiving the foregoing, Arab Bank is producing the *Linde* Bates Nos. set forth in Exhibit 1, which include approximately 180,000 documents and represent all of the Saudi Committee documents that Arab Bank has in its possession and produced in *Linde* after affirmatively obtaining the Saudi Committee’s consent.

REQUEST NO 9:

All Documents concerning transactions processed by Arab Bank on behalf of the Saudi Committee for the benefit of the following HAMAS operatives, including, but not limited to, transaction records, account statements, account opening documentation, communications concerning the transactions and/or recipients, receipts issued by Arab Bank to the HAMAS operatives, and death certificates, photographic identification and certificates of martyrdom and/or proof of incarceration for the individuals that qualified HAMAS operatives to receive payment:

1. Ahmad Sa'id Khalil al-Ja'bari (*see, e.g.*, ABPLC019308);
2. Sabah al-Ja'bari (*see, e.g.*, ABPLC011787);
3. Naser Sami Abd al-Razeq Yataima (*see, e.g.*, ABPLC015894);
4. Murad Ali al-Qawasmeh (*see, e.g.*, ABPLC017093);
5. Abd al-Halim Saqer Fayumi (*see, e.g.*, ABPLC013138);
6. Ali Juma Ahmad Juma (*see, e.g.*, ABPLC013273);
7. Ibrahim Ahmad Khaled al-Muqadama (*see, e.g.*, ABPLC019283);
8. Mahmud Saadi Aliwa (*see, e.g.*, ABPLC013462);
9. Muhammad Jihad al-Hayek (*see, e.g.*, ABPLC013304);
10. Muhanad Talal Mansur Sharim (*see, e.g.*, ABPLC015882);
11. Mumin Omar Maghari (*see, e.g.*, ABPLC013323);
12. Amar Yusuf Kalbuna (*see, e.g.*, ABPLC016946);
13. Mansur Ahmad abu Hamid (*see, e.g.*, ABPL017709); and
14. Ra'ed Abd el-Hamid Abd el-Razaq Misk (*see, e.g.*, ABPL189273).

RESPONSE TO REQUEST NO 9:

Arab Bank objects to Request No. 9 on the grounds that it seeks information that is overly broad, not relevant, and disproportionate to the claims and defenses in these cases. In particular, of the 14 alleged "HAMAS operatives" for whom Plaintiffs are seeking information, none are referenced in the Complaints, much less alleged to have committed, planned, or authorized any of the Incidents. *See* Initial Objections, No. 1. Additionally, the Request calls for all banking records for the intended beneficiaries of these transactions, but the Complaints do not allege such records are related to any of the Incidents. Arab Bank further objects to Request No. 9 to the extent it seeks production of banking records located in foreign jurisdictions that are subject to bank confidentiality laws prohibiting banks from disclosing such records under threat of civil and criminal penalties absent customer consent or regulatory approval. *See* Initial Objections, No. 2. Subject to and without waiving the foregoing, Arab Bank is producing the *Linde* Bates Nos. set

forth in Exhibit 1, which include approximately 180,000 documents and represent all of the Saudi Committee documents that Arab Bank has in its possession and produced in *Linde* after affirmatively obtaining the Saudi Committee's consent.

REQUEST NO 10:

All Documents concerning transactions processed by Arab Bank on behalf of the Al Ansar Society for the benefit of the families of [the following]⁶ martyrs, including, but not limited to, transaction records, account statements, account opening documentation, communications concerning the transactions and/or recipients, receipts issued by Arab Bank to account holders and/or payees, and death certificates, photographic identification and/or certificates of martyrdom for the individuals that qualified the account holder or payee to receive payment:

1. Muhanad Mahmoud Ibrahim Abu Zor;
2. Khaled Nabil Khamis Mohammed Sawalha;
3. Ibrahim Yasser Ibrahim Naji Khalil;
4. Amjad Sulieman Hassan Hussein Abu Salim;
5. Khaldoun Walid Aref Mohammed Sha'ablu;
6. Omar Mohhamed Awad Abu Al-Rob;
7. Yusuf Mohammed Rareb Hamdan Abu Al-Rob;
8. Abd Al-Karim Omar Mohammed Yusuf Ahmed;
9. Nazir Muhammad Mahmud Hamad;
10. Izz al-Din Shuhayl Ahmad al-Masri;
11. Muhammad Ahmad Halas;
12. Bilal Fayez Mustafa Shehada;
13. Muhammad Abd al-Ghani Muhammad Abu Jamus;
14. Imad Atiwi Abu Razaq;
15. Abd al-Rahman Naser Ghazal;
16. Ahmad Abd al-Qader Atiq;
17. Muhammad Hasan Ahmad al-Fayed;
18. Amjad Hussein Ahmad al-Fayed;
19. Khaled Jamal Ali Najem;
20. Mahmud Ali al-Hilwa;
21. Saleh Muhammad Saleh Kamil;
22. Mustafa Abd al-Rahim Yusuf al-Shalabi;
23. Muhammad Khalil Atiya Musharaqa;
24. Muhammad Omar Salim Hawashin;
25. Munir Issa Wishahi;
26. Munqidh Muhammad Sawafteh; and

⁶ Given that Request Nos. 1-9 refer to information requested for "the following" individuals or entities, Arab Bank assumes it was a typographical error that Plaintiffs omitted the words "the following" here. Arab Bank is thus responding as if the Request had stated "the following," without which the Request would be far more disproportionate to the needs of the cases.

27. Yaser Husni Al-Masdar.

RESPONSE TO REQUEST NO 10:

Arab Bank objects to Request No. 10 on the grounds that it seeks information that is overly broad, not relevant, and disproportionate to the claims and defenses in these cases. In particular, of the 27 alleged “martyrs” for whom Plaintiffs are requesting information, only 2 are referenced in the Complaints, and none are alleged to have committed, planned, or authorized any of the Incidents. *See* Initial Objections, No. 1. Arab Bank further objects to Request No. 10 on the grounds that it is vague, ambiguous, unduly burdensome, and/or seeks information outside of Arab Bank’s knowledge because it calls for documents concerning “transactions processed by Arab Bank on behalf of the Al Ansar Society for the benefit of the families of” the alleged martyrs without identifying: (1) the persons who allegedly transferred the funds on behalf of the Al Ansar Society; (2) the “families” of any such “martyrs”; or (3) the persons who were the purported recipients of the transactions. Arab Bank further objects to Request No. 10 to the extent it seeks production of banking records located in foreign jurisdictions that are subject to bank confidentiality laws prohibiting banks from disclosing such records under threat of civil and criminal penalties absent customer consent or regulatory approval. *See* Initial Objections, No. 2. Subject to and without waiving the foregoing, Arab Bank will conduct a reasonable search for, and produce on a rolling basis, non-privileged documents responsive to this Request that relate to individuals identified in the Complaints.


REQUEST NO 11:

All Documents concerning listings or databases provided to, or maintained by, Arab Bank containing the names of Palestinians in Israeli custody, Palestinian “Martyrs,” Suicide Bombers or other persons killed or injured during the Second Intifada, the dates and manner of death or injury of any such individuals, payments made to the families of such persons or Arab Bank contacts with the Saudi Committee, Al Ansar or any organization listed in Request No. 4 regarding such listings and databases, including, but not limited to, Documents which identify Arab Bank employees with knowledge of such listings and databases.

RESPONSE TO REQUEST NO 11:

Arab Bank objects to Request No. 11 on the grounds that it is overly broad, unduly burdensome, vague, and seeks the production of documents that are not relevant, outside of Arab Bank's knowledge, and/or disproportionate to the claims and defenses in these cases. In particular, the Request fails to identify: (1) the individuals in Israeli custody who are described above as "Palestinians"; (2) the assailants, including the alleged "Palestinian Martyrs" and "Suicide Bombers," who were killed or injured during the "Second Intifada"; (3) the "families" of those assailants and thus persons to whom payments were allegedly made; or (4) the individuals related to various organizations, including, among others, the Saudi Committee, Al Ansar, and those listed in Request No. 4, who are alleged to have had "contacts" with Arab Bank. Arab Bank also objects to Request No. 11 because it fails to identify any specific connection between those alleged assailants or individuals in custody and the Incidents. Arab Bank further objects to Request No. 11 to the extent it seeks production of banking records located in foreign jurisdictions that are subject to bank confidentiality laws prohibiting banks from disclosing such records under threat of civil and criminal penalties absent customer consent or regulatory approval. *See* Initial Objections, No. 2. Subject to and without waiving the foregoing, Arab Bank will conduct a reasonable search for, and produce on a rolling basis, non-privileged documents responsive to this Request that are alleged to specifically relate to the Incidents.

Dated: August 23, 2019

By:  _____

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Counsel for Arab Bank, plc

Exhibit 1

**Exhibit 1 to Defendant Arab Bank, plc's Responses and Objections
to Plaintiffs' First Request for the Production of Documents¹**

Request Number(s)	<i>Linde Bates Range</i>
1	ABPLC006883 ABPLC006884 - ABPLC006887 ABPLC006888 - ABPLC006890 ABPLC006891 ABPLC006892 ABPLC006893 ABPLC006894 ABPLC006895 ABPLC006896 ABPLC006897 ABPLC006898 ABPLC006899 ABPLC006900 ABPLC006901 ABPLC006902 ABPLC009927 ABPLC009928 ABPLC009929 ABPLC188913 - ABPLC188914 ABPLC188915 - ABPLC188917 ABPLC188918 ABPLC188919 ABPLC188920 ABPLC188921 ABPLC188922 ABPLC188923 ABPLC188924 ABPLC188925 ABPLC188926 ABPLC188927 ABPLC188928 ABPLC188929 ABPLC188930 ABPLC188931 ABPLC188932 ABPLC188933 ABPLC188934

¹ This chart identifies generally the Requests and the corresponding documents Arab Bank is producing. This is not, however, an exhaustive list in that certain documents may be responsive to more than one Request.

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6, 7, 8, 9	ABPLC006810 - ABPLC006882 ABPLC010553 - ABPLC187051 ABPLC189043 - ABPLC191024 ABPLC196965 - ABPLC198089 ABPLC206382 - ABPLC206483 ABPLC206485 - ABPLC206506 ABPLC209427 - ABPLC211203 ABPLC198090 - ABPLC200300 ABPLC211204 - ABPLC211210 ABPLC211319 - ABPLC211464 ²

² These Bates Nos. are generally responsive to the Requests calling for Saudi Committee documents. They may also contain records responsive to other Requests relating to banking records concerning particular individuals and entities.